UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

| AMERICAN CIVIL LIBERTIES UNION OF MASSACHUSETTS, INC. and AMERICAN OVERSIGHT, |))) |
|---|-------------------------------|
| Plaintiffs, | Civil Action No. 19-10916-NMG |
| v. |) |
| U.S. DEPARTMENT OF HOMELAND SECURITY, |))) |
| Defendant. |))) |

CERTIFICATION BY PLAINTIFF AMERICAN CIVIL LIBERTIES UNION OF MASSACHUSETTS PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1(d)(3), Plaintiff American Civil Liberties Union of Massachusetts, Inc. ("ACLUM") confirms that ACLUM and its counsel have conferred (a) with a view to establishing a budget for the costs of conducting the full course and various alternative courses of the litigation, and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: July 30, 2019

Respectfully submitted,

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Massachusetts, Inc.

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